

PUBLIC SUBMISSION

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Docket: EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0684

Comment submitted by Jim Saunders, Saunders Brothers, Inc.

Submitter Information

Submitter's Representative: Jim Saunders

Organization: Saunders Brothers, Inc.

General Comment

Please reconsider your Chesapeake Bay Regulations. They will force many farmers out of business

- We (farmers, foresters, green industry, agribusiness supplies, processors, etc) are committed to environmental stewardship. Clean water and good soil are fundamental to our businesses. We have been doing our part-and will continue to do so in order to help create a healthy Chesapeake Bay and local waters. Specifically:
 - o Agriculture has met 52% of reduction goals for Nitrogen and 50% for Phosphorus and Sediment—all through a voluntary, incentive based program in Virginia. This doesn't even count the actions farmers are taking on their own without funding.
 - o According to the Virginia Department of Forestry, 83% of logging jobs use the proper combination of best management practices.
 - o University studies have shown that turfgrass when maintained properly, serves as an excellent filter for stormwater runoff, can be a carbon sink, and captures sediment.
- We have been willing partners in making environmental progress—and have proven it with our actions times and time again.
 - o Virginia has over \$80 million into Agricultural Best Management Practice (AG BMP) cost-Share program since 2006. Farmers have matched this spending with \$0.60 of every dollar, and lined up at the door to do more. Annually, willing participants are turned away due to lack of adequate funds at the state and federal level.
 - o Even without cost-share funding, agriculture is taking action. Virginia farmers fence cattle from streams, practice conservation tillage, use proper nutrient management practices, and install buffers along waterways-without “counted” by EPA.

o Without regulatory pressure, the turfgrass/green industry requested that the state create an Urban Nutrient Management Program so that their professionals can have plans specifically tailored for their businesses.

o Lawncare operators have supported and signed Voluntary Water Quality Agreements with the state.

Attachments

EPA-R03-OW-2010-0736-0684.1: Comment attachment submitted by Jim Saunders, Saunders Brothers, Inc.